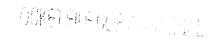
EX PARTE OR LATE FILED



KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.LC.

1301 K STREET, N.W. SUITE 1000 WEST WASHINGTON, D.C. 20005-3317

MICHAEL K. KELLOGG PETER W. HUBER (202) 326-7900 MARK C. HANSEN FACSIMILE: K. CHRIS TODD (202) 326-7999

AUSTIN C. SCHLICK STEVEN F. BENZ NEIL M. GORSUCH

MARK L. EVANS

GEOFFREY M. KLINEBERG

I COMMERCE SQUARE 2005 MARKET STREET **SUITE 2340** PHILADELPHIA, PA 19103 (215) 864-7270

FACSIMILE: (215) 864-7280

February 5, 1998

RECEIVED

Ex Parte Filing

Magalie Salas, Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

FEB - 5 1998

In re Matter of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128

Dear Ms. Salas:

Enclosed for filing in this docket are the original and one copy of a letter to Rose Crellin. I sent this letter to Mr. Muleta today on behalf of the LEC ANI Coalition. I would ask that you include the letter in the record of this proceeding in compliance with 47 C.F.R. § 1.1206(a)(2).

If you have any questions concerning this matter, please contact me at (202) 326-7902.

Yours sincerely,

Michael K. Kellogg

Enclosure

cc: Rose Crellin

Robert Spangler

No of Copies rec'd O + List ABCDE

KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.

I30I K STREET, N.W.
SUITE I000 WEST
WASHINGTON, D.C. 20005-33I7

MICHAEL K. KELLOGG
PETER W. HUBER
MARK C. HANSEN
K. CHRIS TODD
MARK L. EVANS
AUSTIN C. SCHLICK
STEVEN F. BENZ
NEIL M. GORSUCH

GEOFFREY M. KLINEBERG

(202) 326-7900 FACSIMILE: (202) 326-7999 I COMMERCE SQUARE
2005 MARKET STREET
SUITE 2340
PHILADELPHIA, PA 19103
(215) 864-7270
FACSIMILE: (215) 864-7280

February 5, 1998

VIA HAND DELIVERY

Ms. Rose Crellin Federal Communications Commission Common Carrier Bureau 1919 M Street, N.W. Room 6120 Washington, D.C. 20554

Re: Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128

Dear Ms. Crellin:

You have asked us to provide an updated estimate of what percentage of payphone lines will be capable of passing payphone-specific digits on March 9, 1998. As set forth in the attached chart, we anticipate that more than 86 percent of the payphones in the service areas of the Coalition members will be technically capable of passing payphone-specific digits on that date. Of course, payphone specific digits will actually be passed only to interexchange carriers who request these digits; to date, the Coalition members have received few such requests.

¹The Coalition consists of Ameritech, Bell Atlantic, BellSouth, GTE, SBC, SNET, and U S WEST.

KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.

Rose Crellin February 5, 1998 Page 2

This estimate assumes that certain necessary switch software patches are delivered as scheduled. While the Coalition members have no reason to doubt the switch vendors will meet their present commitments, any delays on the part of the switch vendors could materially affect the Coalition members' ability to meet the March 9th deadline.

We also note that this estimate applies only to payphone <u>lines</u> in the Coalition members' service areas. As individual members of the Coalition have already noted in filings with this Commission, specific types of calls on specific types of switches may not properly pass payphone-specific digits. <u>See, e.g.</u>, Letter from Jeffrey B. Thomas, SBC Communications, to Rose Crellin, Common Carrier Bureau, FCC (Jan. 23, 1998).

We hope this information meets your needs. Please do not hesitate to call Kevin Cameron of my office (202-326-7919) with any questions you may have regarding these calculations.

Yours sincerely,

Michael K. Kellogg

Attachment

cc: Robert Spangler

Company	Number of Payphone Lines (BOC + Independent)	Percentage of Lines That Will Be Technically Capable of Passing Payphone-Specific Digits on 3/9/98	Number of Lines That Will Pass Payphone-Specific Digits on 3/9/98
Ameritech	248,966	100%	248,966
Bell Atlantic	595,398	100%	595,398
BellSouth	309,153	100%	309,153
GTE	190,441	60.4%	115,097
SBC SWBT	228,280	75%	171,210
Pacific Bell	213,937	75%	160,453
Nevada Bell	4,444	100%	4,444
SNET	25,562	96.7%	24,709
U S WEST	170,818	49.6%	84,758
Total	1,986,999	86.3%	1,714,188